

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

X

SHEA DEVELOPMENT CORP., BRAVERA, INC., :
and IP HOLDING OF NEVADA CORP., :

Plaintiffs, : Civil Action No. 07-CV-11201 (DLC)

v.

CHRISTOPHER WATSON and ELIZABETH :
ANNE CONLEY, :

Defendants. :

X

**SECOND SUPPLEMENTAL
DECLARATION OF DEFENDANT CHRISTOPHER WATSON**

CHRISTOPHER WATSON, the undersigned, hereby declares and says:

1. I am Christopher Watson and have been named as a Defendant in this action.
2. I have been a resident of Florida since 2005, when I moved to St. Augustine. I moved to Key West in May of 2007. I now reside at 3910 South Roosevelt, Key West, Florida 33040. I am registered to vote in Florida, although I have not yet voted in Florida. I also have a Florida driver's license. I have purchased renter's insurance for my apartment in Key West.
3. My children live with my wife in Daniel Island, South Carolina. I try and spend as much time with my children as possible and be an active part of their lives. I also maintain an apartment in South Carolina at 300 Bucksley Lane, #305, Daniel Island, SC.
4. In addition, I have significant business contacts in South Carolina. I currently own two businesses with significant contacts to South Carolina: Daniel Island Partners LLC and Intellectus LLC. Daniel Island Partners LLC is a South Carolina limited liability company that holds my real estate investments in that State. Intellectus, LLC, is a Florida limited liability

company with its principle place of business in South Carolina. I maintain an office in South Carolina and employ a secretary there.

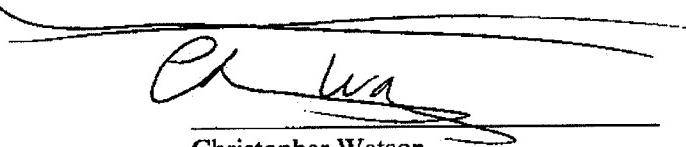
5. I maintain my primary personal bank accounts in South Carolina with a large multi-state bank.

6. I spend a significant portion of the year outside Florida in other locations including the States of; Virginia, South Carolina, California, and Maryland. A review of my calendar for the years of 2006 and 2007 indicates the following in regards to my travel schedule.

- a) I was in South Carolina approximately 130 days in 2006, and 122 days in 2007.
- b) I was in Virginia approximately 137 days in 2006, and 118 days in 2007
- c) I was in California approximately 30 days in 2006 and 32 days in 2007.
- d) I was in other locations in the United States accounted for approximately 18 days in 2006 and 42 days in 2007
- e) I was outside of the United States approximately 39 days in 2006 and 5 days in 2007.
- f) I was in Florida approximately 11 days in 2006 and 46 days in 2007.

7. Even though I maintain my primary residence in Florida, I intend to continue spending a significant amount of time in South Carolina for the foreseeable future because that is where my children live. Accordingly, I do not object to the characterization of South Carolina as my domicile for purposes of Federal diversity jurisdiction.

I declare that the foregoing is correct under the penalties of perjury. Executed this 12th day of May 2008.



Christopher Watson

AFFIDAVIT OF SERVICE VIA FACSIMILE & REGULAR MAIL

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Regina Cajigas, being duly sworn, deposes and says, that deponent is not a party to the action, is over 18 years of age and resides at Brooklyn, NEW YORK.

That on the 12th day of May, 2008, deponent served the within
SECOND SUPPLEMENTAL DECLARATION OF DEFENDANT CHRISTOPHER WATSON

upon

VIA FACSIMILE - 212-661-7769

Thomas V. Marino, Esq.
Dunnington Bartholow & Miller LLP
1359 Broadway
New York, NY 10018

attorneys in this action, at the addresses designated by said attorneys for that purpose by transmitting a copy to the above-named person(s) by FACSIMILE at said fax number;

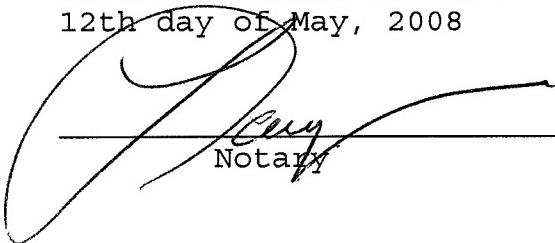
SAME AS ABOVE

the remaining attorneys in this action, at the addresses designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States post office department within the State of New York.



REGINA CAJIGAS

Sworn to before me this
12th day of May, 2008



Laurie Egan
Notary

LAURIE EGAN
Notary Public, State of New York
No. 01EG5062768
Qualified in Orange County
Commission Expires Aug. 7, 2008